

EXHIBIT H

FILED UNDER SEAL

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9
UNITED STATES DISTRICT COURT

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12
13 GOOGLE LLC,

14 Plaintiff

15 v.

Case No. 3:20-cv-06754-WHA

16 SONOS, INC.,

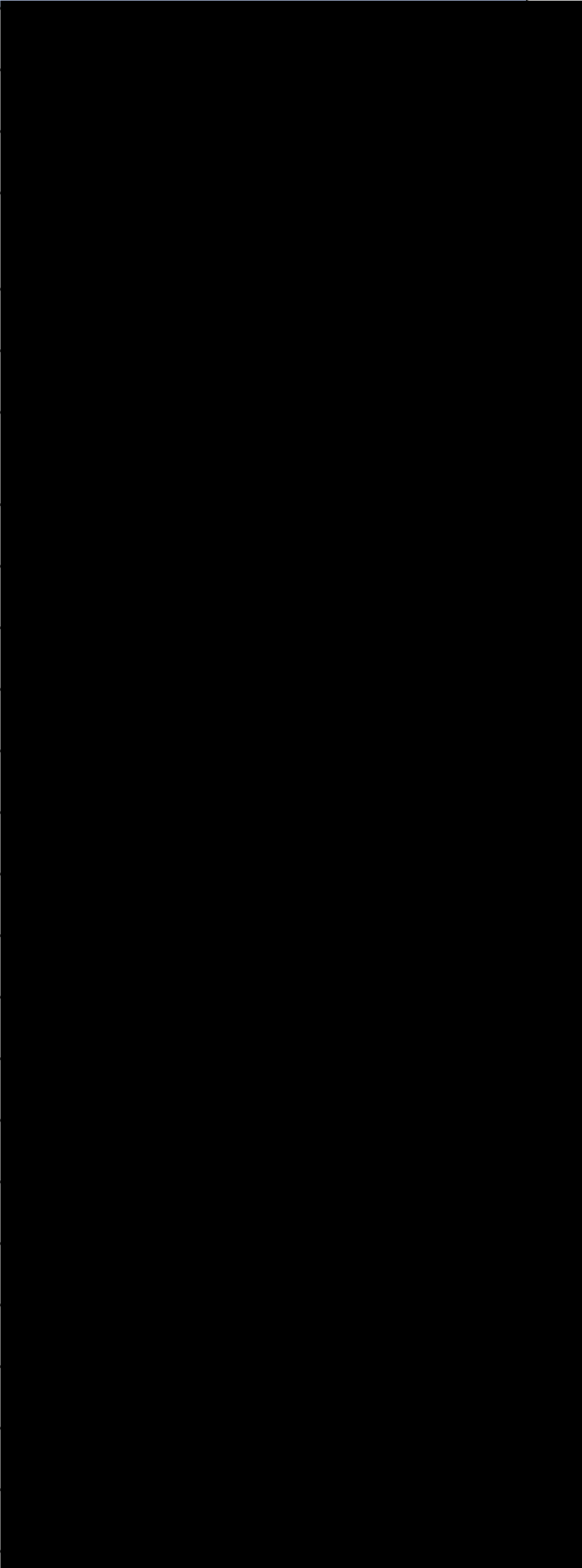
17 Defendant.

18
19 **GOOGLE LLC’S FOURTH SUPPLEMENTAL OBJECTIONS AND RESPONSES TO**
20 **PLAINTIFF SONOS, INC.’S FIRST SET OF FACT DISCOVERY INTERROGATORIES**
(NOS. 5, 9, 17)

21 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Google LLC
22 (“Google”) hereby objects and responds to Plaintiff Sonos, Inc.’s (“Sonos”) First Set of Fact
23 Discovery Interrogatories to Defendant (“Interrogatories”). Google responds to these
24 Interrogatories based on its current understanding and the information reasonably available to
25 Google at the present time. Google reserves the right to supplement these responses if and when
26 additional information becomes available.

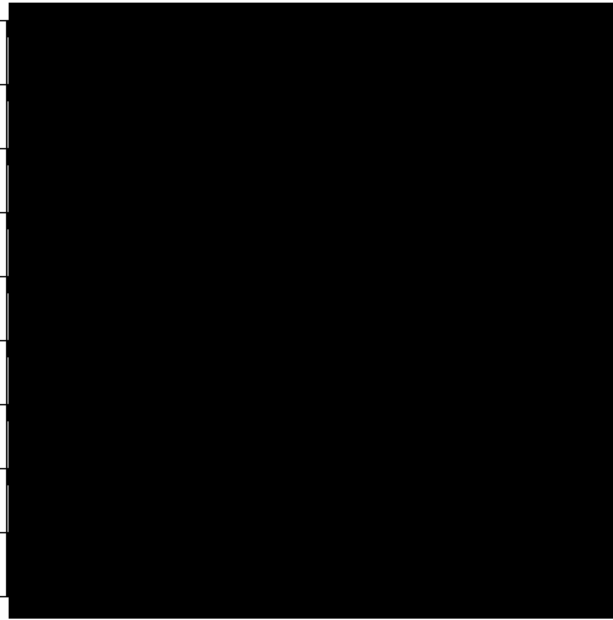
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Google provides the following internal code names for the accused hardware products:

Product Name	Internal Code Name(s)
Chromecast	
Chromecast (V3)	
Chromecast Ultra	
Chromecast Ultra	
Chromecast Audio	
Chromecast Audio	
Chromecast with Google TV	
Google Home Mini	
Google Home Mini	
Nest Mini	
Google Home	
Google Home	
Google Home Max	
Nest Audio	
Nest Hub	
Nest Hub Max	
Nest Wifi	
Pixel	
Pixel XL	
Pixel 2	
Pixel2XL	
Pixel 3	
Pixel 3 XL	
Pixel 3a	

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Pixel 3a XL
Pixel 4
Pixel 4 XL
Pixel 4A
Pixel 4A 5G
Pixel 5
Pixel Slate (tablet)
Pixelbook (laptop)
Pixelbook Go (laptop)

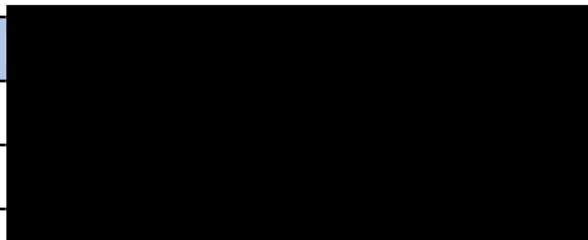


Google is continuing to investigate with respect to codenames, internal names, and/or project names associated with the Accused Instrumentalities. Google objects to the remainder of this request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. Google is willing to meet and confer to clarify and narrow the scope of the remainder of this request.

SUPPLEMENTAL RESPONSE: Google maintains the General and Specific objections set forth above. Subject to and without waiving the foregoing General and Specific objections, Google responds, as follows:

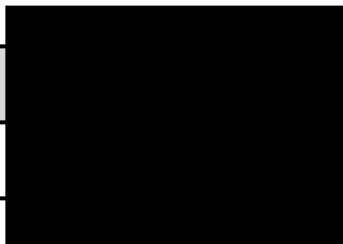
Google provides the additional internal code names for the accused hardware products:

Product Name
Pixel 6
Pixel 6 Pro



The version for the system software that was originally installed on the accused speaker products is identified below:

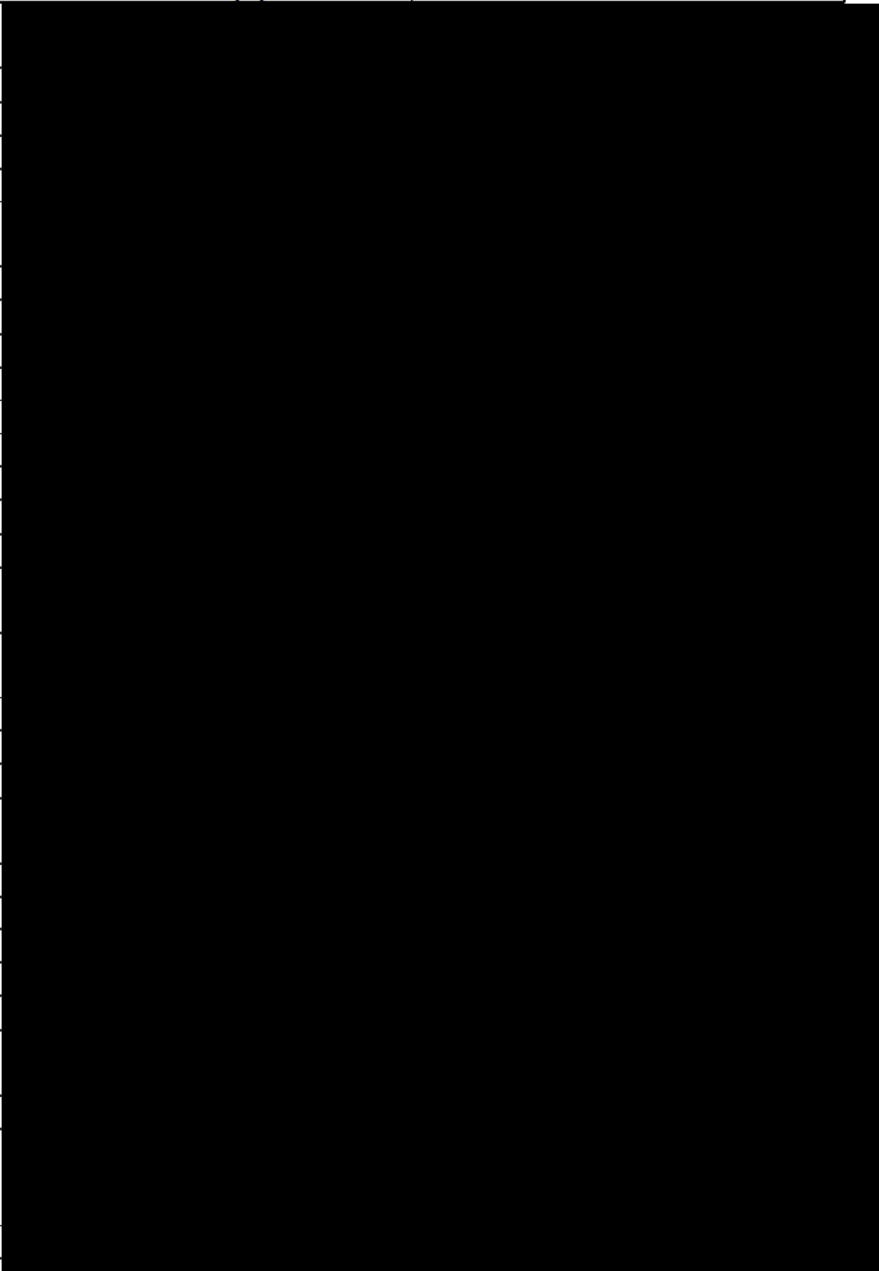
Product
Home Mini



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THIRD SUPPLEMENTAL RESPONSE: Google maintains the General and Specific objections set forth above. Subject to and without waiving the foregoing General and Specific objections, Google responds, as follows:

For the accused hardware products, the following firmware version numbers were released on the following dates¹:

Version	Device(s)	Date
1.32a		
1.32b		
1.32a		
1.32a		
1.33		
1.33		
1.34		
1.34		
1.35		
1.35		
1.35		
1.35		
1.35		
1.35		
1.35		
1.36		
1.36		
1.36		
1.36		
1.36		
1.36a		
1.32a		
1.36b		
1.36a		
1.37		
1.37		
1.37		
1.32a		
1.37hf		
1.37hf2		

¹ The dates are approximate dates, given that not all versions are rolled out in a schedule that contains the same milestones.

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1	1.39
2	
3	1.39
	1.39hf
4	1.39hf2
	1.40
5	1.40
6	1.36b
	1.36b
7	1.42
8	1.42a
	1.42a
9	1.42a
10	1.42aHF
	1.42HF
11	1.42HF
12	1.42aHF2
	1.42st
13	1.42stHF
	1.44
14	1.44
15	1.44aHF
16	1.44aHF2
	1.44aHF3
17	1.46
	1.46aHF
18	1.46
	1.46d
19	1.46v
	1.49
20	1.49HF
	1.49HF
21	1.49
	1.49HF
22	1.49 HF
	1.50
23	1.50
	1.50
24	1.50
	1.50
25	1.50 HF
	1.50 HF
26	1.52
	1.52
27	1.52 HF
	1.52 HF
28	1.52 HF

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1	1.54	
2	1.54	
	1.54	
3	1.54 HF	
	1.54 HF	
4	1.54bs	
	1.54bs	
5		
	1.56	
6	1.56	
	1.56	
7	1.56.1	
	1.56.1	
8	1.56.1 HF	
	1.56.1 HF	
9	1.49HF	
	1.49 HF	
10	1.50	
	1.50	
11	1.50	
	1.50	
12	1.50	
	1.50	
13	1.50 HF	
	1.50 HF	
14	1.52	
	1.52 HF	
15	1.52 HF	
16	1.54	
	1.54	
17	1.54	
	1.54 HF	
18	1.54 HF	
	1.54bs	
19	1.54bs	
20	1.56	
	1.56	
21	1.56	
	1.56.1	
22	1.56.1	
	1.56.1 HF	
23	1.56.1 HF	
24		

Pursuant to 33(d) of the Federal Rules of Civil Procedure, Google has produced information regarding software versions associated with the accused apps at GOOG-SONOSNDCA-00071315.

INTERROGATORY NO. 9:

For each Accused Instrumentality, identify the actual and projected sales, prices, costs,